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May 6, 2021

*VIA ECF*

Hon. Margo K. Brodie  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, Room N 626  
Brooklyn, NY 11201

**Re: Klimovitsky v. JG Innovative Industries, Inc., et al.**  
**Case No. 21-CV-755 (MKB)(RER)**

Dear Judge Brodie:

This firm represents the defendants in the above-referenced action. Pursuant to Your Honor's April 30<sup>th</sup> Order, the parties hereby propose the following deadlines for this case:

Plaintiff files amended complaint	May 24, 2021
Defendants file motion to dismiss	June 7, 2021
Plaintiff files opposition papers	June 21, 2021
Defendants file reply papers	July 1, 2021

The parties thank the Court for its time and attention to this matter.

Respectfully Submitted,

/s/Nils C. Shillito

Nils C. Shillito (NS-6755)

cc: Shalom Law, PLLC (via ecf)